

EXHIBIT D

FILED UNDER SEAL

CONTAINS CONFIDENTIAL OR
HIGHLY CONFIDENTIAL MATERIAL –
SUBJECT TO PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLENN FREEDMAN, Individually and On Behalf
of All Others Similarly Situated,
Plaintiff,

vs.

WEATHERFORD INTERNATIONAL LTD., et al.,
Defendants.

Case No. 1:12-cv-2121

Hon. Lewis A. Kaplan

ECF Case

CROSS-NOTICE OF DEPOSITION OF

REDACTED

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Bernard J. Duroc-Danner, through his counsel, will depose REDACTED for up to three and one-half hours commencing at the end of the Plaintiff's examination scheduled to occur on May 6, 2015, at the offices of Mayer Brown LLP, 700 Louisiana Street, Suite 3400, Houston, TX 77002, or a mutually agreeable time and location. All parties are invited to attend. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed. The deposition may also be transcribed by LiveNote, accessible to counsel who have appropriate computer equipment, and may be recorded by videotape by a professional videographer, in addition to stenographic means. Any party wishing to have the deposition recorded by another method may serve written notice

designating the desired method on all other parties and must make arrangements for the additional method at their own expense.

Dated: April 27, 2015

Respectfully Submitted,

/s/ N. Scott Fletcher

N. Scott Fletcher

Admitted *Pro Hac Vice*

Email: sfletcher@jonesday.com

Elizabeth G. Myers

Admitted *Pro Hac Vice*

Email: emyers@jonesday.com

JONES DAY

717 Texas, Suite 3300

Houston, TX 77002-2712

Telephone: (832) 239-3939

Facsimile: (832) 239-3600

Attorneys for Defendant Bernard J. Duroc-Danner

CERTIFICATE OF SERVICE

I certify that on April 27, 2015, I served the foregoing on all counsel of record by electronic mail, facsimile, regular mail or certified mail, return receipt requested.

/s/ N. Scott Fletcher

N. Scott Fletcher